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April 1, 2021

**VIA ECF and EMAIL**

Honorable Shelley C. Chapman  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004

Re: In re WMCH 25 Holdings, LLC  
Case No. 20-12534 (SCC)

Dear Judge Chapman:

We represent Albert Togut, not individually, but solely in his capacity as the Chapter 7 Trustee of the above-refenced debtor (the “Debtor”). We respectfully submit this letter on behalf of the Trustee in connection with: (a) the letter submitted by claimant Leonard Blum, requesting a conference pursuant to the Court’s *Stipulated Protective Order* [Dkt. No. 13] in connection with a discovery dispute concerning Mr. Blum’s anticipated motion to dismiss this Chapter 7 case upon the ground that it is a two-party dispute [Dkt. No 24]; and (b) the reply letter submitted by Westwood Capital LLC and Quarter Century Holdings, LLC (collectively, the “Non-Parties”) [Dkt. No. 25].

Your Chambers has recently advised that the Court will schedule a conference during early April to address the discovery dispute among Mr. Blum and the Non-Parties (the “Conference”).

The Trustee takes no position regarding the parties’ discovery dispute. However, the Trustee is a party in interest in this case, and we will attend the Conference, especially to be heard in connection with any discussion regarding the disposition of this Chapter 7 case.

As this Court may be aware, the Clerk of the Court fixed March 29, 2021 as the Claims Bar Date in this case [Dkt. No. 16]. As of the date hereof, Mr. Blum is the only creditor who has filed a proof of claim in this case. Consequently, it appears that the Court might treat this Chapter 7 case as a two-party dispute.

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The Trustee has advised Mr. Blum that he and our firm have devoted time and resources to this case. Consequently, the Trustee respectfully requests that if during the Conference, the Court addresses Mr. Blum's desire to file a motion to dismiss this Chapter 7 case, the Trustee be heard to address a procedure by which administrative claims can be satisfied in connection with, and as a condition to, dismissal of this case.

Respectfully,

TOGUT, SEGAL & SEGAL LLP  
By:  
*/s/ Neil Berger*  
Neil Berger

NB/lv  
cc by email: Albert Togut, Esq.  
Andy Velez-Rivera, Esq.  
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